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17 *Attorneys for Defendant Elon Musk*

18
19 **UNITED STATES DISTRICT COURT**
20
21 **CENTRAL DISTRICT OF CALIFORNIA**

22 VERNON UNSWORTH,

23 Case No. 2:18-cv-08048

24 Plaintiff,

25 Judge: Hon. Stephen V. Wilson

26 vs.

27 **DECLARATION OF MICHAEL T.**
28 **LIFRAK IN SUPPORT OF JOINT**
29 **STIPULATION TO RESCHEDULE**
30 **THE TRIAL DATE**

31 ELON MUSK,

32 Defendant.
33
34 Complaint Filed: September 17, 2018
35 Trial Date: October 22, 2019
36 Requested Trial Date: December 2, 2019

1 **I, Michael T. Lifrak, declare as follows:**

2 1. I am a member of the bar of the State of California and a partner at
3 Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Elon Musk. I
4 make this declaration of personal, firsthand knowledge, and if called and sworn as a
5 witness, I could and would testify competently thereto.

6 2. I submit this declaration in support of the parties Joint Stipulation to
7 Reschedule the Trial Date to December 2, 2019.

8 3. On or about May 7, 2019, Quinn Emanuel was retained as lead trial
9 counsel for Mr. Musk in the above titled action. I made my first appearance in this
10 action on behalf of Mr. Musk on May 8, 2019 (DKT #38).

11 4. Prior to being retained by Mr. Musk, I had been serving as counsel in
12 two prior-filed actions, which actions had already been set for trial in conflict with
13 the October 22, 2019 trial date presently scheduled for this matter.

14 5. The first is an arbitration titled *Canon v. UC Block 3 Associates LP* set
15 to begin on October 22, 2019, before Arbitrator Paul A. Bruno (JAMS) in San
16 Francisco. This arbitration is scheduled to last two weeks.

17 6. The second is the action titled *Baptiste v. Goguen*, case number CIV
18 537691, in San Mateo Superior Court, which case was filed on March 8, 2016.
19 Although the case has been delayed several times, trial is currently scheduled to
20 begin on October 15, 2019. The trial in that case is expected to last several weeks.

21 7. I would be prepared to try this action starting on December 2, 2019.

22 8. On May 31, 2019, I conferred with Plaintiff's counsel, Mr. L. Lin
23 Wood, regarding the request to continue the trial date to December 2, 2019. Mr.
24 Wood confirmed that Plaintiff would not oppose such request.

1 I declare under penalty of perjury under the laws of the State of California that
2 the foregoing is true and correct and that this document was executed in Los
3 Angeles, California.

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5 DATED: June 5, 2019
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8 By 
9 Michael T. Lifrak
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